UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

THE NEW YORK TIMES COMPANY,

Plaintiff,

v.

MICROSOFT CORPORATION, OPENAI, INC., OPENAI LP, OPENAI GP, LLC, OPENAI, LLC, OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI CORPORATION, LLC, and OPENAI HOLDINGS, LLC,

Defendants.

Civil Action No. 1:23-cv-11195-SHS

DECLARATION IN SUPPORT OF MOTION FOR ADMISSION OF ATTORNEY PRO HAC VICE

Adnan Muttalib, declares:

- 1. I am an attorney with the law firm of Susman Godfrey L.L.P.
- 2. I submit this declaration in support of my motion for admission to practice pro hac vice in the above-captioned matter.
- 3. As shown in the Certificate of Good Standing annexed hereto, I am a member in good standing of the State Bar of New York.
- 4. There are no pending disciplinary proceedings against me in any state or federal court.
- 5. I have never been convicted of a felony.
- 6. I have never been censured, suspended, disbarred, or denied admission or readmission by any court.
- 7. My attorney registration number for the State Bar of New York is 5919238.
- 8. Wherefore, your declarant respectively submits that he be permitted to appear as counsel and advocate *pro hac vice* in case 1:23-cv-11195 for Plaintiff (The New York Times Company).
 - I, Adnan Muttalib, declare under penalty of perjury that the foregoing is true and correct.

Dated: January 25, 2025 Respectfully Submitted,

/s/ Adnan Muttalib

Adnan Muttalib (*pro hac vice forthcoming*) NY State Bar No. 5919238 SUSMAN GODFREY L.L.P. 1900 Ave of the Stars, Suite 1400 Los Angeles, CA 90067

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Attorneys for Plaintiff
The New York Times Company